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16 **UNITED STATES BANKRUPTCY COURT**
17 **DISTRICT OF NEVADA**

18 In re:

19 ROBIN LINUS LEHNER and
20 DONYA TINA LEHNER,

21 Debtors.

22 Case No. 22-14616-nmc
23 Chapter 7

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28 **STIPULATION FOR LIMITED RELIEF FROM THE AUTOMATIC STAY**
IN FAVOR OF BLACK KNIGHT SPORTS AND ENTERTAINMENT LLC
D/B/A VEGAS GOLDEN KNIGHTS, TO EFFECTUATE SETOFF

29 Debtor, Robin Linus Lehner (“Mr. Lehner”), Black Knight Sports and Entertainment
30 LLC d/b/a Vegas Golden Knights (the “Club”), and Robert Atkinson, in his capacity as chapter 7
31 trustee in the above-referenced bankruptcy case (the “Chapter 7 Trustee” and together with the
32 Debtors and the Club, the “Parties”), by and through their respective undersigned counsel,
33 hereby stipulate and agree (the “Stipulation”) as follows:

34 1. On or about October 2, 2020, Mr. Lehner and the Club entered into a National
35 Hockey League Player’s Contract, and related Addendum (the “NHL Contract”) for a term of
36 five (5) League Years (as defined therein) commencing on or about July 1, 2020.

37 2. On December 30, 2022 (the “Petition Date”), Mr. Lehner and his wife filed their
38 voluntary petition for relief under chapter 7 of the Bankruptcy Code, thereby commencing their
39 bankruptcy case (the “Chapter 7 Case”), and the Chapter 7 Trustee was appointed in the case.

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1 3. The NHL Contract remained in effect as of the Petition Date, and there are certain
2 future rights and future obligations under that agreement, including without limitation, a right to
3 payment for post-petition services in favor of Mr. Lehner, but subject to all terms and conditions
4 therein.

5 4. On January 17, 2023, the Chapter 7 Trustee filed an application to abandon any
6 interest of the bankruptcy estate in and to the NHL Contract, subject to certain limitations as set
7 forth therein to non-exempt compensation owing to Mr. Lehner as of the Petition Date [ECF No.
8 22], however, as of the date of this Stipulation, the time for approval of that application has not
9 passed, and thus Mr. Lehner includes the Chapter 7 Trustee as a signatory to this Stipulation, and
10 out of an abundance of caution, and merely for the purpose of confirming that he has no
11 objection to the limited stay relief requested herein.

12 5. The Club has advised that there is a pre-petition obligation owing to it by Mr.
13 Lehner related to his use of a rental car with the Club's credit card in the amount of \$4,220.31
14 (the "Rental Obligation"), which remained outstanding as of the Petition Date, and which it
15 would like to setoff against its future payments to him under the NHL Contract.

16 6. The Parties agree that the Club may be granted limited relief from the automatic
17 stay pursuant to 11 U.S.C. § 362 and for the sole and exclusive purpose of allowing it to
18 effectuate a setoff of the Rental Obligation against any future payments due Mr. Lehner under
19 the NHL Contract.

20 7. Nothing herein is intended or should be construed as altering or amending any
21 other rights or remedies either Mr. Lehner or the Club have in and to the NHL Contract, which
22 remains in full force and effect without change, and the parties reserve all rights in that regard.

23 NOW, THEREFORE, the Parties request that the Court enter the proposed Order
24 attached hereto as Exhibit 1, thereby approving this Stipulation and the relief requested herein.
25 The Parties also request relief from any stay of the effectiveness of this Order pursuant to Fed. R.
26 Bankr. P. 4001(a)(3), such that the Order shall be effective immediately upon its entry on the
27 docket.

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1 Dated: January ___, 2023.

2 APPROVED:

3 By: /s/ Matthew C. Zirzow
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10 Attorneys for Black Knight Sports
11 and Entertainment LLC,
12 d/b/a Vegas Golden Knights

13 APPROVED:

14 By: /s/ Robert E. Atkinson
15 ROBERT E. ATKINSON
16 CHAPTER 7 BANKRUPTCY TRUSTEE
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21 Chapter 7 Trustee

22 # # #

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